

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re	}	Chapter 13
	}	
MARY ALICE MARGARET HANNON,	}	BANKRUPTCY No. 5-06-bk-51870
	}	
Debtor	}	

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MARY ALICE MARGARET HANNON,	}	
	}	{ Nature of Proceeding: Order dated
Movant,	}	December 18, 2009 (Doc. #81)}
	}	
v.	}	
	}	
COUNTRYWIDE HOME LOANS, INC.,	}	
	}	
Respondent.	}	
	}	

**RESPONDENT COUNTRYWIDE HOME LOANS, INC.'S MOTION TO CONTINUE  
HEARING ON SHOW CAUSE ORDER**

TO THE HONORABLE JOHN J. THOMAS, UNITED STATES BANKRUPTCY JUDGE:

Countrywide Home Loans, Inc. ("Countrywide"), files this Motion to Continue Show Cause Hearing and would respectfully show the following:

1. Countrywide is the Respondent in Debtor's Motion for Rule 9011 Sanctions (Doc. #41) and Debtor's Motion for Sanctions Under 11 U.S.C. § 105 and the Court's Inherent Power (Doc. #58) (together, the "Sanctions Motions"). Countrywide was represented by Oren Klein, Esq. and the law firm of Parker McCay LLP in the defense of the Sanctions Motions. Pursuant to the Court's Opinion (Doc. #80) and Order (Doc. #81) ("Show Cause Order") entered December 18, 2009, the Court has directed Countrywide to appear on Thursday, January 28, 2010 and "show cause why it should not be sanctioned under Federal Rule of Bankruptcy Procedure 9011(c)(1)(B) for failing to timely amend their proof of claim upon receipt of the sheriff's refund; for ignoring this responsibility intentionally as evidenced by the stipulated

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paragraph heretofore cited; and for making claim on funds based on what became a false proof of claim”.

2. In light of the concerns expressed by the Court in its Opinion as the basis for issuing the Show Cause Order, Countrywide has determined to engage new counsel in this matter to represent it in connection with the Court’s Show Cause Order, in substitution for Mr. Klein and the Parker McCay LLC law firm. Dino A. Ross, Esq. and Dorothy A. Davis, Esq., of Eckert Seamans Cherin & Mellott, LLC have entered their appearance for Countrywide in this matter by Notice of Appearance and Simultaneous Request for Withdrawal (Doc. #85) filed with this Court on January 13, 2010. Thomas A. Connop, Esq. and Bradley Knapp, Esq. of the Dallas, Texas office of Locke Lord Bissell & Liddell, LLP, have applied for pro hac vice admission to appear as co-counsel for Countrywide (Doc. ##87, 88).

3. Countrywide respectfully requests the Court continue the hearing on the Show Cause Order for a period of approximately forty-five (45) days to permit Countrywide and its counsel to investigate the facts and circumstances giving rise to the Show Cause Order in order to adequately prepare for the hearing thereon.

4. As reflected in the Certificate of Non-Concurrence appended to this motion, the undersigned has communicated with Debtor’s counsel regarding this request for continuance. While Debtor’s counsel has consented to a continuance of the hearing to February 11, 2010, the courtesy of which is appreciated, Countrywide notes the Order directs it to respond to the Court’s concerns, not Debtor’s. Accordingly, Countrywide and its new counsel believe the 45 days requested is necessary to enable them to adequately prepare for the hearing.

5. Countrywide submits there will be no prejudice to any party by the granting of this motion. The opportunity to investigate the underlying facts by new counsel is intended to promote judicial economy and bring enhanced clarity to the issues before the Court.

6. Countrywide files this Motion for Continuance of Show Cause Hearing, not for purposes of delay, but so that justice may be done. This is Countrywide's first request for a continuance of the hearing on the Show Cause Order.

WHEREFORE, Countrywide respectfully requests the Court enter an Order continuing the hearing on the Order (Doc. #81) for a period of approximately forty-five (45) days to a date of the Court's convenience.

Dated: January 15, 2010.

Respectfully submitted,

/s/Dino A. Ross

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